

REMARKS

Claims 19-21 and 23-44 are currently pending in the application. Claims 1-18 and 22 have been previously canceled. No new matter has been added. Applicants submit that all pending claims are in condition for allowance. Applicants respectfully request reconsideration of the outstanding rejections and allowance of all pending claims in view of the reasons set forth below.

I. Summary of Rejections

Claims 19-21, 27-29, 31, 33-34, 36, and 42-44 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 6,256,625 B1 to Breyer et al. (hereafter “Breyer”) in view of U.S. Patent 5,911,066 to Williams et al (hereafter “Williams”) and further in view of U.S. Patent 6,894,802 B1 to Biondi et al (hereafter “Biondi”).

Claims 23-26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Breyer in view of Williams and Biondi, and further in view of U.S. Patent 5,986,667 to Jevans, (hereafter “Jevans”).

Claims 30 and 32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Breyer, in view of Williams and Biondi, and further in view of U.S. Patent Application Publication 2003/0041163 A1 to Rhoades et al. (hereinafter “Rhoades”).

Claims 35, 37-41 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Breyer, in view of Williams and Biondi, and further in view of U.S. Patent 6,823,524 B1 to Hewett, (hereafter “Hewett”).

II. Claim Rejections under 35 U.S.C. § 103

A. Claims 19-21, 27-29, 31, 33-34, 36, and 42-44

Claims 19-21, 27-29, 31, 33-34, 36, and 42-44 are rejected under 35 U.S.C. 103(a) as being unpatentable over Breyer in view of Williams and Biondi. Applicants respectfully traverse this rejection.

1. Claim 19

Applicants respectfully submit that Breyer, Williams and Biondi, alone or in any reasonable combination, fail to disclose or suggest **sharing the data object among the multiple data sink objects to prevent extraneous copies of the data**, as recited in Applicants' claim 19.

In the Office Action, the Examiner correctly indicates that Breyer modified by Williams does not explicitly disclose *sharing the data object among the multiple data sink objects to prevent extraneous copies of data* (Office Action, page 4, § 8). However, the Examiner asserts that Biondi teaches this claim feature. Applicants respectfully disagree.

Biondi generally discusses the image data being transferred from an image data source to a network storage device. The network storage device buffers and then transfers the image data to the image data sinks (Col. 4, lines 51-55).

In the first cited section, Biondi indicates that users load the images into the image data source. The image data source then captures images and begins transferring the image data corresponding to the images to a first image data sink via the network storage device. A user can then load another image into the image data source. The image data source will then capture any additional images and organize the images into a job without requiring that the previous images have been transferred to the first image data sink. The image data source can then transfer any previously stored job(s) to a second image data sink (Col. 4, line 56 – Col. 5, line 5). In this section, Biondi discusses sending different images to different data sinks. As such, this section does not discuss *sharing the data object among the multiple data sink objects to prevent extraneous copies of data*, as recited in Applicants' claim 19.

In the second cited section, Biondi indicates that the images can also be sent to many destinations. The image data sink may be one or more of a combination of the network storage device, image data sink and/or the image data sink (Col. 5, lines 17-20). In this section, Biondi discusses sending the images to different sinks, but it is not clear whether Biondi sends the *same* image to many destinations. Moreover, this section too is silent about *sharing the data object among the multiple data sink objects to prevent extraneous copies of data*, as recited in

Applicants' claim 19. Nowhere in the reference does Biondi disclose or suggest *preventing extraneous copies of data*, as provided in Applicants' claim 19.

In light of the above remarks, Applicants respectfully submit that the combination of Breyer, Williams and Biondi fails to disclose or suggest each and every element of claim 19. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claim 19 under 35 U.S.C. § 103(a).

2. Claims 20-21, 27-29, 31 and 33

Claims 20, 21, 27-29, 31 and 33 depend from amended claim 19 and, as such, incorporate each and every element of amended claim 19. In light of the arguments presented above, Breyer, Williams and Biondi, alone or in combination, do not disclose or suggest each and every element of claims 20, 21, 27, 28, 31 and 33. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 20, 21, 27-29, 31 and 33 under 35 U.S.C. § 103(a).

3. Claim 34

Claim 34 recites similar elements to amended claim 19. Specifically, claim 34 recites, among other elements, **sharing the data object among the multiple data sink objects to prevent extraneous copies of the data**. In light of the arguments presented above for claim 19, Breyer, Williams and Biondi, alone or in combination, do not disclose or suggest at least this claim element. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claim 34 under 35 U.S.C. § 103(a).

4. Claims 36, 42 and 44

Claims 36, 42 and 43 depend from claim 34 and, as such, incorporate each and every element of claim 34. In light of the arguments presented above, Breyer, Williams and Biondi, alone or in combination, do not disclose or suggest each and every element of claims 36, 42 and 43. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 36, 42 and 43 under 35 U.S.C. § 103(a).

B. Claims 23-26

Claims 23-26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Breyer, in view of Williams and Biondi, and further in view of Jevans.

As presented above, Breyer, Williams and Biondi, alone or in any reasonable combination do not disclose or suggest **sharing the data object among the multiple data sink objects to prevent extraneous copies of the data**, as recited in claim 19. Claims 23-26 depend from claim 19 and, as such, incorporate the patentable subject matter of claim 19. Jevans fails at curing the shortcomings of Breyer, Williams and Biondi with regard to at least this claim element.

Jevans does not disclose or suggest **sharing the data object among the multiple data sink objects to prevent extraneous copies of the data**, as recited in claim 19. Jevans discusses attaching a renderer to a view object by calling a procedure and passing in the view object and the renderer object. Thus, in Jevans, the data object is not shared among multiple data sink objects.

Breyer, Williams, Biondi and Jevans, alone or in combination, do not disclose or suggest each and every element of amended claim 19. Accordingly, claims 23-26 are in condition for allowance for at least the reasons set forth above. Claims 23-26 also recite additional patentable features.

1. Claim 23

Claim 23 recites *at least one data listener object that is registered to a respective one of the multiple data sink objects*. The Examiner correctly indicates that Breyer as modified by Williams and Biondi does not explicitly teach at least one or more data listener object that is registered to a respective one of the multiple data sink objects (Office Action, page 6, § 23). However, the Examiner asserts that Jevans teaches this feature (Office Action, page 7, § 24). Applicants respectfully disagree.

The sections of Jevans cited by the Examiner as teaching at least one data listener object that is registered to a respective one of the multiple data sink objects discusses registering renderer object classes (Col. 11, lines 33-36). Accordingly, the Examiner appears to assert that

the data listener object recited in Applicants' claim 23 is equivalent to the renderer object class of Jevans. Applicants respectfully disagree. As defined in the present application (and as indicated by its name) a data listener object listens to the data sink object that the listener is registered with for status updates. For example, the data sink object notifies the data listener objects when the state of the data sink object changes to be active or inactive (Present Application, page 12, first ¶). Jevans is silent about a *data listener object*.

The Examiner asserts that the renderer object classed being registered *to a respective one of the multiple data sink objects*. In Jevans, the renderer object classes are generally registered with the system so that their functionality is available when required (Col. 11, line 36). However, nowhere in the reference does Jevans indicate that the renderer object classes are listeners that are registered *to a respective one of the multiple data sink objects*, as required by Applicants' claim 23. Jevans, alone or in any reasonable combination with Breyer, Williams and Biondi, does not disclose or suggest *at least one data listener object that is registered to a respective one of the multiple data sink objects*, as recited in Applicants' claim 23.

2. Claim 24

Claim 24 also recites additional patentable features. Claim 24 recites that *the respective one of the multiple data sink objects deletes each of the at least one data listener object registered with the respective one of the multiple data sink objects when the respective one of the multiple data sink objects is deleted*.

Jevans only discusses deleting a generated graphical object, such as a polygon object (Col. 27, lines 27-28). However, the graphical object of Jevans, e.g. the polygon object, is not a *data listener object* recited in Applicants' claim 24. Since the Examiner asserts that the renderer object classes of Jevans equivalent to the data listener objects recited in the pending application, in order to teach the features of claim 24, Jevans should teach deleting the renderer object classes. Nowhere in the reference does Jevans disclose or suggest deleting each of the registered renderer object classes. As such, Jevans, alone or in any reasonable combination with Breyer, Williams and Biondi, does not disclose or suggest that *the respective one of the multiple data sink objects deletes each of the at least one data listener object registered with the respective*

one of the multiple data sink objects when the respective one of the multiple data sink objects is deleted, as required by Applicants' claim 24.

3. Claim 26

Claim 26 recites that *the respective one of the multiple data sink objects notifies each of the at least one data listener object when the respective one of the multiple data sink objects is updated with a new data object*. The Examiner asserts that Jevans teaches this claim feature at Col. 11, lines 45-67 and Col. 12, lines 1-20. However, the cited sections of Jevans merely provide the code used to register renderer object classes. In fact, Jevans is silent about a data sink object notifying a data listener object, i.e. a renderer class object. Jevans alone or in any reasonable combination with Breyer, Williams and Biondi, does not disclose or suggest that *the respective one of the multiple data sink objects notifies each of the at least one data listener object when the respective one of the multiple data sink objects is updated with a new data object*.

In light of the foregoing arguments, Applicants respectfully request the Examiner withdraw the rejection of claims 23-26 under 35 U.S.C. § 103(a).

C. Claims 30 and 32

Claims 30 and 32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Breyer, in view of Williams and Biondi, and further in view of Rhoades.

As presented above, Breyer, Williams and Biondi, alone or in any reasonable combination do not disclose or suggest **sharing the data object among the multiple data sink objects to prevent extraneous copies of the data**, as recited in amended claim 19. Claims 30 and 32 depend from claim 19 and, as such, incorporate the patentable subject matter of claim 19. Rhoades fails at curing the shortcomings of Breyer, Williams and Biondi with regard to at least this claim element.

The sections of Rhoades identified by the Examiner discuss real-time streams of data that can be framed into self contained segments [0127]. Rhoades also discusses that streams of datagrams flow between processors [0132]. Rhoades further discusses forwarding the datagrams

as a whole [0151]. Thus, Rhoades does not disclose or suggest **sharing the data object among the multiple data sink objects to prevent extraneous copies of the data**, as recited in claim 19.

Breyer, Williams, Biondi and Rhoades, alone or in combination, do not disclose or suggest each and every element of claim 19. Accordingly, claims 30 and 32 is in condition for allowance for at least the reasons set forth above. Accordingly, Applicants respectfully request the Examiner withdraw the rejection of claim 32 under 35 U.S.C. § 103(a).

D. Claims 35 and 37-41

Claims 35 and 37-41 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Breyer, in view of Williams and Biondi, and further in view of Hewett.

As presented above, Breyer, Williams and Biondi, alone or in any reasonable combination do not disclose or suggest **sharing the data object among the multiple data sink objects to prevent extraneous copies of the data**, as recited in claim 34. Claims 35 and 37-41 depend from claim 34 and, as such, incorporate the patentable subject matter of claim 34. Hewett fails at curing the shortcomings of Breyer, Williams and Biondi with regard to at least this claim element.

Hewett is cited by the Examiner to provide teachings for the feature added in claims 35 and 37-41. Hewett discusses managing the distribution of events in a data processing system. Hewett, however, does not disclose or suggest **sharing the data object among the multiple data sink objects to prevent extraneous copies of the data**, as recited in claim 34.

Breyer, Williams, Biondi and Hewett, alone or in combination, do not disclose or suggest each and every element of claim 34. Accordingly, claims 35 and 37-41 are in condition for allowance for at least the reasons set forth above. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 35 and 37-41 under 35 U.S.C. § 103(a).

CONCLUSION

In view of the above comments, Applicants believe the pending application is in condition for allowance and urge the Examiner to pass the claims to allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicants' attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-035RCE. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. § 1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

Dated: June 17, 2009

Respectfully submitted,

By:/Neslihan I. Doran/
Neslihan I. Doran
Registration No.: L0389
LAHIVE & COCKFIELD, LLP
One Post Office Square
Boston, Massachusetts 02109-2127
(617) 227-7400
(617) 742-4214 (Fax)
Attorney/Agent For Applicant